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**MEMO ENDORSED**

**By ECF**

Hon Judge Valerie E. Caproni  
U.S. District Judge  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

USDC SDNY  
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Re: Grullon v. Lewis, et al. (Case No. 1:24-cv-4892-VEC-SN)  
Joint Request to Extend Discovery Deadlines

Dear Judge Caproni,

The Parties, Plaintiff Luis Grullon and Defendants Steven D. Lewis, Giuseppe Zappala, Galactic Records, and Republic Records, by and through their respective counsel, respectfully move this Court for a brief extension of time until March 21, 2025, to file their Joint Status Report on Discovery. In support of this Motion, the Parties state as follows:

1. Pursuant to the Court's October 18, 2025 Scheduling Order [40], the Parties are required to submit a Joint Status Report on Discovery by March 20, 2025;
2. The Parties have been engaged in ongoing discussions regarding the status of discovery, including the exchange of written discovery and the scheduling of depositions. Additional time is needed to finalize the report to ensure it accurately reflects each Party's position and any remaining disputes.
3. There are outstanding discovery issues. Due to these outstanding issues, additional discussions between counsel are necessary to address the status of discovery and ensure a complete and accurate report.
4. The requested one-day extension will allow the Parties to clarify their respective positions and provide a more comprehensive update to the Court on the status of discovery and any remaining disputes.
5. This request is made in good faith and is not intended to cause undue delay or prejudice to any Party.

**WHEREFORE**, the Parties respectfully request that the Court grant this Motion and extend the deadline to file the Joint Status Report to March 21, 2025.

Dated: March 20, 2025

Respectfully submitted,

/s/ Benjamin Lockyer  
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*Counsel for Plaintiff Luis Grullon*

CC. (by ECF): Mark S. Kaufman  
*Counsel for Luis Grullon*

Carla Miller  
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*Counsel for Republic Records, an unincorporated division of UMG Recordings, Inc.*

Sarah Matz  
Madyson Niucci  
*Counsel for Defendants Steven Lewis, Galactic Record and Giuseppe Zappala*

Application GRANTED. The deadline to file the joint letter is adjourned *nunc pro tunc* to **today, March 21, 2025**.

In the Civil Case Management Plan and Scheduling Order, the parties were specifically advised that fact discovery must be completed by March 24, 2025, and that "[t]he fact discovery deadline will be a **firm** deadline absent **extraordinarily** good cause." Dkt. 40, ¶ 5(a) (emphasis in original). The parties' representations that they have not exchanged written discovery, depositions have not been scheduled, and unspecified "issues" remain "outstanding" suggest that the parties will not complete discovery by the Court-ordered deadline. Accordingly, the letter must address whether extraordinarily good cause exists to adjourn the deadline and why the parties have failed to raise their "outstanding discovery issues" with the Court until the eve of the deadline.

Moreover, the Court notes that this request was made in violation of Rule 2(C) of the Undersigned's Individual Practices in Civil Cases, which provides that extension requests must be made at least 48 business hours prior to the original due date. Continued failure to comply with the Individual Practices may result in sanctions.

SO ORDERED.

 3/21/2025

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE